

DRINKER BIDDLE & REATH LLP

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Indemnity Company and Affiliates

Presentment Date and Time:

September 17, 2010, 9:45 a.m.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, et al.,	:	Case No. 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:	
	:	(Jointly Administered)
Debtors.	:	
	:	
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**NOTICE OF PRESENTMENT OF STIPULATION AND CONSENT ORDER
WITHDRAWING PROOFS OF CLAIM NUMBERED 59003, 59004, 59005 AND 59006
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 3006**

PLEASE TAKE NOTICE that upon the application of The Travelers Indemnity Company and its affiliates (“Travelers”), the undersigned will present the attached Stipulation and Consent Order by and between Motors Liquidation Company f/k/a General Motors Corp. (“Old GM”), Chevrolet-Saturn of Harlem, Inc., Saturn, LLC and Saturn Distribution Corporation (collectively, the “Debtors”) and Travelers (together with the Debtors, the “Parties”) to the Honorable Robert E. Gerber of the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), One Bowling Green, New York, New York 10004-1408, in Courtroom 621, at a hearing to be held on September 17, 2010 at 9:45 a.m. (Eastern Time) (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the proposed Stipulation and Consent Order, must be (a) made in writing and filed with the Bankruptcy Court no later than 4:00 p.m. (Eastern Time) on September 7, 2010 (the “Objection Deadline”) and (b) served

so as to be actually received by the following parties by the Objection Deadline: (i) counsel to the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153 (Attn: Evan S. Lederman, Esq. and Lacy Laken, Esq.); and (ii) Counsel for Travelers, Drinker Biddle & Reath LLP, 500 Campus Drive, Florham Park, New Jersey 07932-1047 (Attn: Michael P. Pompeo, Esq.). Only objections made in writing and timely filed and received will be considered by the Bankruptcy Court at the Hearing. Unless objections are received by that time, the Stipulation and Consent Order may be entered.

Dated: August 6, 2010

DRINKER BIDDLE & REATH LLP
A Delaware Limited Liability Partnership
Attorneys for The Travelers
Indemnity Company and Affiliates

By: /s/ Michael P. Pompeo

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